

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS JOSEPH D. CASEY

DEFENDANTS BLATT, HASENMILLER, LEIBSKER & MOORE, LLC

(b) County of Residence of First Listed Plaintiff PHILADELPHIA
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorney's (Firm Name, Address, and Telephone Number) Cary L. Flitter, Esq.,
Flitter Lorenz, P.C., 450 N. Narberth Avenue, Suite 101, Narberth, PA 19072, (610) 822-0782

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | PTF | DEF | PTF | DEF |
|--|---|----------------------------|----------------------------|
| Citizen of This State <input type="checkbox"/> 1 | <input type="checkbox"/> 1 Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State <input type="checkbox"/> 2 | <input type="checkbox"/> 2 Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 | <input type="checkbox"/> 3 Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN (Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause: FDCPA 15 USC § 1692

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** CHECK YES only if demanded in complaint **JURY DEMAND:** ☒ Yes ☐ No.

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

Nov. 9, 2015

Cary L. Flitter

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 8645 Steeple Drive, Philadelphia, PA 19128

Address of Defendant: 10 South LaSalle Street, Suite 2200, Chicago, IL 60603

Place of Accident, Incident or Transaction: 8645 Steeple Drive, Philadelphia, PA 19128

Use Reverse Side For Additional Space

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock? (Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases

(Please specify) Fair Debt Collection Practices Act, 15 U.S.C. § 1692

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability (Asbestos)
9. ☐ All other Diversity Cases

(Please specify)

ARBITRATION CERTIFICATION

(Check appropriate Category)

I, _____, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☐ Relief other than monetary damages is sought

DATE: _____

Attorney-at-Law

Attorney I.D.

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: Nov 9, 2015

CIV.609 (4/03)

Cay L. Fitt
Attorney-at-Law

35047
Attorney I.D.

APPENDIX I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**


CASE MANAGEMENT TRACK DESIGNATION FORM

JOSEPH D. CASEY	:	CIVIL ACTION
v.	:	
	:	
BLATT, HASENMILLER, LIEBSKER & MOORE, LLC	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through §2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (X)
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

<u>Nov 9, 2015</u> Date	 Attorney at Law	<u>Cary L. Flitter</u> Attorney for Plaintiff
<u>610-822-0782</u> Telephone <small>(Civ.660) 10/02</small>	<u>610-667-0552</u> Fax Number	<u>cflitter@consumerslaw.com</u> E-Mail Address

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH D. CASEY
8645 Steeple Drive
Philadelphia, PA 19128

Plaintiff,

vs.

BLATT, HASENMILLER, LEIBSKER &
MOORE, LLC
10 South LaSalle Street
Suite 2200
Chicago, IL 60603

Defendant

CIVIL ACTION

NO.

COMPLAINT

I. INTRODUCTION

1. This is a lawsuit against a national debt collection law firm, “Blatt” for malicious prosecution and violation of the requirements of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (“FDCPA”).

2. In November, 2014, Blatt sent an initial collection letter seeking \$4,820.51 to Joseph Casey for a debt he did not incur and did not owe. Casey immediately disputed the debt in writing, advising Blatt it was not his. Rather than properly verify the debt as the FDCPA requires, Blatt sued Casey. After suit, Casey again advised Blatt that he owed no such debt. Rather than verify the debt, obtain proof or drop the case, Blatt continued to press the lawsuit in court. Only because Casey showed up at Court to defend himself on the day for trial did Blatt then deign to withdraw the case, although without prejudice.

3. The filing of the lawsuit after being put on written notice and the continued prosecution of the case which was later admitted to be baseless as to Casey was malicious and

violated the protective provisions of the FDCPA.

II. JURISDICTION

4. Subject matter jurisdiction of this Court arises under 15 U.S.C. §1692k, actionable through 28 U.S.C. §§1331 and 1337.

5. Venue is proper as Defendant regularly does business in this district and Plaintiff resides in this district.

III. PARTIES

6. Plaintiff is Joseph D. Casey (“Plaintiff” or “Casey”) is an adult individual and a consumer who resides in Philadelphia, Pennsylvania at the address captioned.

7. Defendant Blatt, Hasenmiller, Leibsker & Moore, LLC (“Defendant” or “Blatt”) is believed to be an Illinois limited liability company a principal place of business at the address captioned.

8. Defendant regularly engages in the collection of consumer debts using the mails and telephone.

9. Defendant regularly attempts to collect consumer debts alleged to be due another.

10. Defendant is a “debt collector” as that term is contemplated in the FDCPA, 15 U.S.C. § 1692a(6).

IV. STATEMENT OF CLAIM

11. On or about November 11, 2014, Defendant Blatt send an initial collection letter to Casey seeking to collect on a consumer debt that was allegedly due to Bank of America, N.A., as successor in interest to FIA Card Services. A copy of the November 11, 2014 letter is attached hereto as Exhibit A (redacted in part per Fed. R. Civ. P. 5.2).

12. The November 11, 2014 letter carried the validation notice provided by the FDCPA, 15 U.S.C. § 1692g.

13. In response to the November 11, 2014 letter Casey wrote to Blatt on November 21, 2014. In that letter, Casey advised Blatt that he had received the November 11th demand letter on November 15, 2014, but that “I do not owe anyone anything. At the age of 74, I can state that I have paid all of my bills on time, every one of them. I never had a Bank of America or FIA [Card] Services account.” Casey concluded “just so it is clear I dispute the existence of the debt that you wrote is mine. Please send all of the material I requested or that you stated you will provide within 30 days from the date of this letter.”

14. Casey’s letter was mailed to Blatt, postage prepaid, on November 22, 2014.

15. Blatt did not respond to the demand for verification nor provide the validation information requested and required under 15 U.S.C. § 1692g. Blatt did not respond to Casey’s dispute in a timely manner, nor at any time thereafter.

16. Instead, in January of 2015, Blatt commenced a civil suit against Casey in the Municipal Court of Philadelphia at Docket No. SC-15-01-29-6217.

17. In pursuit of that lawsuit, Blatt caused a process server to come to Casey’s house to serve Casey with legal process in the above Municipal Court matter.

18. At the time of service, Casey advised the process server that while his name was Joseph Casey, he did not have any obligation whatever with the Bank of America.

19. Casey then proceeded to obtain credit reports from the credit bureaus. The credit reports provided some objective information that there was no record of an overdue or defaulted Bank of America account in the name of Plaintiff Casey.

20. On or about February 26, 2015, Casey sent into Municipal Court a Notice to Defend along with a request for a continuance. The continuance request was granted and the hearing rescheduled for May 18, 2015 in the Philadelphia Municipal Court.

21. After having received the credit report, Casey wrote a letter to Blatt's local attorney Syretta Martin. In the May 4, 2015 letter, Casey included a copy of his earlier November 21, 2014 dispute letter. Plaintiff reiterated that "I am not the Joseph Casey that is the subject of the referenced civil action. Please obtain a positive identifier ..." A copy of that letter is attached hereto as Exhibit "B".

22. Casey did not receive a response from Blatt in reply to his May 4, 2015 letter, either.

23. On May 18, 2015, Casey appeared in Court per the Summons. At that point in time, on the day of the scheduled trial, a Blatt attorney believed to be Christopher Allen Titus told Mr. Casey that Blatt had determined that someone else owed this money, not Casey, Plaintiff herein. Casey asked the Blatt lawyer why this took six months to resolve, why his previous letters went unanswered and why he had to come to Court to see to it that a default judgment was not entered against him.

24. Casey asked Blatt's lawyer to dismiss the case against him with prejudice. Blatt's lawyer refused.

25. Casey overheard Blatt's lawyer state that the "Joseph Casey we [Blatt] wanted is out of state" or words to that effect. Casey stated that he preferred to have the case proceed to trial rather than have the case against him dismissed merely "without prejudice." However, the Trial Commissioner did not require it, and the baseless collection suit against Casey was therefore marked on the docket as "withdrawn, without prejudice."

COUNT I
(FAIR DEBT COLLECTION PRACTICES ACT)

26. Plaintiff repeats the allegations contained above as if the same were here set forth at length.

27. Under the FDCPA, a debt collector must “cease collection of a debt” on the date it receives a consumer’s request for verification “until the debt collector obtains verification of the debt.” 15 U.S.C. § 1692g(b). The collector is liable if it continues to collect on the debt until it provides an appropriate verification.

28. Specifically, Blatt was barred from filing the instant Municipal Court lawsuit – and from any other collection activity – upon receipt of Casey’s timely dispute letter and demand for verification.

29. In filing the instant suit, and in continuing to prosecute the dispute despite repeated advice that Casey did not owe this debt in any manner, Blatt violated the Act’s prohibition on misrepresentation of the character, status or amount of the debt, § 1692e(2).

30. Blatt also violated the Act’s prohibition on demanding any amount not due under contract or law. 15 U.S.C. § 1692f(1).

31. As a result of Defendant’s actions and this baseless suit being filed and continued, Casey has suffered embarrassment, aggravation, loss of time and emotional distress.

WHEREFORE, Plaintiff Joseph D. Casey demands judgment against Defendant Blatt, Hasenmiller, Leibsker & Moore, LLC for:

- (a) Actual damages;
- (b) Statutory damages;
- (c) Attorney’s fees and costs; and

(d) Such other and further relief as the Court shall deem just and proper.

COUNT II
STATE LAW – MALICIOUS PROSECUTION/ABUSE OF PROCESS

32. Plaintiff repeats the allegations contained above as if the same were here set forth at length.

33. The filing of the collection lawsuit and the proceeding of the matter to the day of trial was not warranted by fact or law. On the facts, Plaintiff Casey did not have any debt or obligation whatsoever to Blatt's client Bank of America. On the law, there was no contractual obligation and Blatt was barred by the FDCPA from further proceeding or filing suit until it verified the debt. 15 U.S.C. § 1692g(b).

34. The collection lawsuit represented an improper and abuse of use of the state court process.

35. Blatt had an improper purpose in both bringing the suit, after being put on notice and continuing to prosecute the suit until the day of trial, *i.e.*, to obtain judgment regardless of the legal liability. The filing of the suit, taking of the matter to the day of trial, the refusal to respond to repeat written requests for proof or clarification reflects a flagrant disregard for the law and an abuse of process.

WHEREFORE, Plaintiff Joseph D. Casey demands judgment against Defendant Blatt, Hasenmiller, Leibsker & Moore, LLC for:

- (a) Actual damages;
- (b) Statutory damages;
- (c) Attorney's fees and costs; and
- (d) Such other and further relief as the Court shall deem just and proper.

V. JURY DEMAND

Pursuant to Fed.R.Civ.P. 38, Plaintiff demands trial by jury as to all issues so triable.

Respectfully submitted:

DATE:

Nov 11, 2015



CARY L. FLITTER
ANDREW M. MILZ
Attorneys for Plaintiff

FLITTER LORENZ, P.C.
450 N. Narberth Avenue, Suite 101
Narberth, PA 19072
(610) 822-0782

EXHIBIT "A"

Law Offices

Blatt, Hasenmiller, Leibsker & Moore LLC

10 South LaSalle St. * Suite 2200 * Chicago, Illinois 60603-1069
Phone 1-855-240-0826 * Fax 312-277-3809

11-11-14

JOSEPH D CASEY
8645 STEEPLE DR
PHILADELPHIA PA 19128



RE: Creditor: BANK OF AMERICA, N.A.
 Customer: JOSEPH D CASEY
 Balance Owed: \$4820.51
 Previous Acct. #: XXXXXXXXXXXX7604
 Current Acct. #: XXXXXXXXXXXX6819

Dear JOSEPH D CASEY:

Our law firm has been retained by Bank of America, N.A., successor-in-interest to FIA Card Services (the "Bank"), in connection with the above-referenced account. Please be advised that the Bank intends to invoke its right to file a lawsuit against you.

If you notify this firm within thirty (30) days after your receipt of this letter, that the debt or any portion thereof, is disputed, we will obtain verification of the debt or a copy of the judgment, if any, and mail such verification or judgment to you. Upon your written request within the same thirty (30) day period mentioned above, we will provide you with the name and address of the original creditor, if different from the current creditor.

Unless you dispute the validity of the debt or any portion thereof within thirty (30) days after your receipt of this letter, we will assume that the debt is valid.

This communication is from a debt collector. We are attempting to collect a debt and any information obtained will be used for that purpose.

Sincerely,

Blatt, Hasenmiller, Leibsker & Moore, LLC

This account is issued and administered by Bank of America, N.A., successor in interest to FIA Card Services, N.A.

6022 (Redacted)



EXHIBIT "B"

05/04/2015 16:15 FAX

TU CRIMINAL JUSTICE

001

*** TX REPORT ***

TRANSMISSION OK

TX/RX NO	0029	
CONNECTION TEL		912155643818
CONNECTION ID		
ST. TIME	05/04 16:15	
USAGE T	00'25	
PGS. SENT	2	
RESULT	OK	

JOSEPH D. CASEY
8645 STEEPLE DRIVE
PHILADELPHIA, PENNSYLVANIA 19128
MAY 4, 2015

Syretta J. Martin
1835 Market Street Suite 501
Philadelphia, PA 19103


Re: SC-15-01-29-6217

Dear Attorney Martin:

I am sending you a copy of a letter dated November 21, 2014 that I sent to your company's office in Illinois. I am not the Joseph Casey that is the subject of the referenced civil action. Please obtain a positive identifier (date of birth, social security number, or both) from your client, write to me advising that you have the information, and I will meet with you before the court date to conclusively show you that you caused a complaint to be served on the wrong Joseph Casey. This will save the Court valuable time. If you choose not to do this, ensure that you bring to Court the contract, including signature, and the date of birth and the social security number of the person who you claim owes this debt.

Please don't ignore this letter as you did to the letter dated February 14, 2015 I sent you concerning your failure to comply with the proper procedure in your failure to provide a self-addressed and stamped envelope with a copy of the complaint.

Very truly yours,


Joseph D. Casey

JDC/ms